

EPA Region 10 Position Paper
on
Past Uses of Phosphate Slag
in the Pocatello/Soda Springs Area of Southeast Idaho

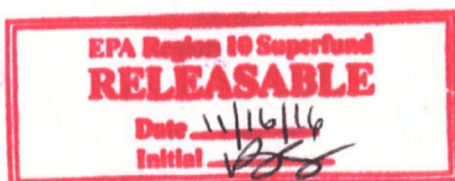
CONFIDENTIAL

Past uses of phosphate slag from Monsanto and FMC in southeast Idaho include uses for construction purposes including aggregate in concrete and asphalt, roadbed fill, backfill, railroad ballast, and in the foundations of some homes, particularly in Soda Springs. The use of slag for house foundations was curtailed in 1977. However, slag has been used extensively for outdoor construction after that time. Between 50 and 200 homes in Soda Springs are thought to contain slag, and most of the streets in Pocatello and Soda Springs contain slag. Monsanto discontinued the distribution of all slag generated at their plant in 1987. After the release of the Idaho Radionuclide Study in May of 1990, both Monsanto and FMC discontinued any further distribution of slag. However, some municipalities, counties and companies have continued to use stockpiled slag, primarily for street repair.

In August of this year, Dana Rasmussen, Regional Administrator for EPA Region 10, concurred on a strategy for the management of past uses of off-site phosphate slag in southeast Idaho under CERCLA removal authorities. This strategy recognizes the critical need for community input into decisions regarding residential properties in accordance with commitments in the Community Involvement Plan. Meaningful community involvement and voluntarism form the cornerstone for the success of the strategy. The strategy also recognizes the need for EPA actions to be consistent with the final Science Advisory Board report.

The EPA Region 10 "slag strategy" focuses on the need to gather more definitive exposure information, especially concerning residential construction using slag. A Work Plan for a "removal site assessment" will be an EPA Region 10 lead activity with support from ORP, OSWER, and industry as appropriate. The Work Plan may include graded decision guidelines incorporating action levels or these may be developed as a separate activity at a future time. Region 10 intends that the removal site assessment be conducted by Monsanto and FMC pursuant to a CERCLA 106 Administrative Order on Consent. EPA will provide oversight of field activities and data management.

Exposure information collected during the "removal site assessment" will be used to determine the magnitude of individual exposure threats from residential gamma fields and the extent, if any, of residential contamination requiring removal actions to abate imminent and substantial endangerments. The "slag strategy" does not contemplate remediation of slag-containing streets, sidewalks or other outdoor areas nor does it specifically address regulatory controls for future off-site uses of slag. Issues related to future uses of slag are seen by the Region to involve national policies involving RCRA and the Bevil Amendment.

PSSSF
1.1.2 -

41714